

ESTTA Tracking number: **ESTTA685653**

Filing date: **07/24/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91221511
Party	Plaintiff NIKE, Inc.
Correspondence Address	HELLEN HILL MINSKER BANNER & WITCOFF LTD 10 SOUTH WACKER DRIVE, SUITE 3000 CHICAGO, IL 60606 UNITED STATES hminsker@bannerwitcoff.com, mhouston@bannerwitcoff.com, esullivan@bannerwitcoff.com, bwptotm@bannerwitcoff.com, bwlitdock-et@bannerwitcoff.com
Submission	Stipulated/Consent Motion to Extend
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Signature	/helen hill minsker/
Date	07/24/2015
Attachments	Agreed Motion for 30 Day Extension of Deadline for Initial Disclosures.pdf(69341 bytes)

NIKE, INC.,)	
)	
Opposer,)	Opposition No. 91221511
vs.)	
)	
CAPITAL E FINANCE CO, LLC,)	
Applicant.)	
)	

Opposer and Applicant respectfully request that the deadline for the parties to serve their initial disclosures be extended by thirty (30) days, to **August 23, 2015**. The parties are exploring the possibility of using the Board's ACR procedure, and are engaged in ongoing communications regarding the possible format for an ACR stipulation. To allow time for these ongoing discussions, as well as time to present any proposed ACR stipulation to the Board for its consideration, both parties agree that it would be beneficial to extend the initial disclosure deadline. At this time, the parties are not proposing to extend the remaining dates in the Board's scheduling order, so the only date impacted by this motion is the July 24, 2015 deadline for initial disclosures. As this motion is made for good cause, it is respectfully requested that it be granted.

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Attorneys for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Agreed Motion for 30 Day Extension of Deadline for Initial Disclosures was served by first class mail to the following address on July 24, 2015, such being the Applicant's correspondence address listed in the TTABVUE system as of this date:

Matthew Heller
Capital E Finance Co, LLC
53 Appleton Street
Boston, Massachusetts 02116-6213
United States

A courtesy copy of the foregoing document is also being sent this same day to Applicant's representative, Matthew Heller, at the following email address: capitalefinance@gmail.com .

/helen hill minsker/

Helen Hill Minsker